

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CHARLES CRAWLEY,</b>	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 1:24-cv-06692
	)	
<b>NEO4J, INC., a Delaware corporation;</b>	)	
<b>STEVE TUREK; KRISTIN CABOT;</b>	)	
<b>MARC ROUALET; ALYSON WELCH;</b>	)	
<b>CLIFF BOCKARD; KENT CORSON;</b>	)	
<b>and ALYSSA PERREAULT,</b>	)	
	)	
Defendants.	)	

**DECLARATION OF CHARLES CRAWLEY**

I, CHARLES CRAWLEY, declare the following:

1. I am more than eighteen (18) years of age, suffering from no legal disability, and I make this declaration based on my own personal knowledge.
2. My current primary residence is located at 20542 W. Yorkshire Drive, Kildeer, Illinois 60047 and is a citizen of the State of Illinois.
3. I was employed by Neo4j, Inc. from August of 2022 to December 7, 2023, in Chicago, Illinois.
4. All my in-person meetings with Defendant, TUREK, occurred in Chicago, Illinois.
5. On December 7, 2023, Defendant, TUREK abruptly terminated me in Chicago, Illinois. On December 8, 2023, Defendant, TUREK texted me to invite me out for drinks in Chicago, Illinois. I declined his invitation.
6. Since September of 2017, Defendant, TUREK, has been the Vice President of US Sales Central Region for Neo4j and was my direct supervisor throughout my employment with

Neo4j, Inc. Defendant, TUREK, also supervised over 10 other Neo4j employees who are required to reside in Chicago. Defendant, Neo4j, Inc., requires its Chicago job applicants to reside in Chicago including myself when I applied to Neo4j, Inc.

7. Neo4j, Inc. does not have a regional office in Florida, nor does Neo4j have any employees in the state of Florida.
8. Plaintiff states that based upon conversations with Defendant, TUREK, he understood Turek and family lived in Chicago, Illinois and his children attended high school in Chicago, Illinois.
9. Defendant, TUREK would vacation or spend time in Florida like many citizens of Illinois.

Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true and correct.

Executed this 15<sup>th</sup> day of August, 2024.

By: \_\_\_\_\_

CHARLES CRAWLEY

**EXHIBIT 2**